

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**STATE OF TENNESSEE, and
TENNESSEE BUREAU OF
INVESTIGATION,**

Defendants.

Case No. 2:24-cv-2101

CHIEF JUDGE LIPMAN

JOINT MOTION FOR STIPULATED PROTECTIVE ORDER

Plaintiff United States and Defendants State of Tennessee and the Tennessee Bureau of Investigation (TBI) (“Parties”) request the entry of a Stipulated Protective Order in this case. The Parties agree that certain categories of information in this case should be treated as confidential to limit this information’s disclosure, dissemination, and use, and to protect alleged victims, other witnesses, and potential witnesses pursuant to Federal Rules of Civil Procedure 5.2(e) and 26(c). To facilitate discovery and appropriate use of such information, the Parties have agreed to a protective order in the form attached as Exhibit 1, which they will also send in Word format via email to the Court. Accordingly, Parties request that the Court grant this Motion and enter the attached Protective Order.

DATED: July 1, 2024

Respectfully submitted,

For Plaintiff United States of America:

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was filed and served via the Court's electronic filing system on this the 1st day of July 2024, upon:

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